



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4350-150th Ave. N.E. • Redmond, Washington 98052-5301 • (206) 867-7000  
August 16, 1988

Phil Struck, Environmental Specialist  
Bremerton-Kitsap County Health Department  
109 Austin Drive  
Bremerton, WA 98310

Dear Mr. Struck:

This letter will constitute the Department of Ecology's recommendations with respect to the Bremerton Auto Wrecking Demolition Waste Disposal Site.

A review of materials available from the files shows that there has been an ongoing problem with compliance at this facility. In particular, items not conforming to the definition of "Demolition Wastes" WAC 173-304-100 (19), or "Inert Wastes" WAC 173-300-100 (40) have been accepted contrary to the terms of the permit.

During our inspection of the site on August 12th, we noted numerous items falling outside the definition of inert or demolition wastes. In view of recent communications between the Bremerton-Kitsap County Health Department and representatives for Bremerton Auto Wrecking, I was unhappy to see this lack of compliance.

Aside from materials deposited contrary to recent permits, there is the issue of an undetermined volume of chemical and industrial wastes which may have been accepted from the Navy during the 1960's or later. Information on this is sketchy, but it does give me cause for concern; particularly in view of the fact that the south fork of Gorst creek runs beneath the site via a culvert, and subsequently passes through a salmon hatchery on its way to Sinclair Inlet in Puget Sound. I feel there is the potential for serious impact on the environment resulting from the leaching or direct flow to surface water of materials deposited in the landfill. The extent of the potential for damage, however, is unknown.

Sweet-Edwards/EMCON, Inc. has done a preliminary review of the site. According to a copy you provided of their June 6th letter, the cost for closure at this time may exceed one million dollars. The possibility for expansion of the site was considered, but appears to be unfeasible, all things considered.

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You have indicated that it is your belief the present owner, Ms. Lucille Uhnick, lacks the funds to close the site in the manner proposed by Sweet-Edwards. A letter from her attorney, James Sells, dated July 14th would tend to confirm this. Unless you can determine by some means such as a full financial disclosure that Ms. Uhnick does have the necessary funds, it seems we are left with a no win situation.

Based on all available information, I make the following recommendations for closure of this facility.

(1) Based on the evidence of lack of compliance, I urge that the Bremerton Auto Wrecking Demolition Waste Disposal Site be ordered to cease accepting all solid waste materials immediately. Authority for suspension of the permit is provided in RCW 70.95.200, although you may simply opt not to renew the permit.

It is my opinion that continued operation of the site would only increase the potential for injury to the environment and future liability. The Department of Ecology would not support renewal of the permit for any period of time unless the owner/operator could meet the following conditions:

A) Remove existing uncovered wastes not conforming to the definition of inert or demolition debris, and provide evidence of proper disposal.

B) Provide clear evidence in writing and by actual site management that only demolition debris and inert waste would be accepted in the future.

C) Demonstrate that continued operation of the site would provide significant income allowing for a more appropriate closure of the site by October 28, 1989. Mandatory site closure is anticipated by this date as it appears virtually impossible that the site could be brought into compliance with the minimum functional standards, Chapter 173-304 WAC before that time.

2) The site has been permitted as a demolition waste disposal site. Despite the obvious potential for problems, I recommend that the site be closed as such, in compliance with the specifications of WAC 173-304-461, "Inert waste and demolition waste landfilling facility requirements," and WAC 173-304-405, "General facility requirements." My reasoning here is simply based on the present assumption that sufficient funds are lacking to afford a more appropriate closure. In no way is it our intent to excuse the present owner/operator from potential future liabilities in the matter.

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3) In the fall, I recommend that you contact me for assistance in running some tests on water quality in Gorst Creek. Your department may wish to undertake some more long term monitoring of its own.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Dorsey", with a long horizontal stroke extending to the right.

Kyle Dorsey  
Solid Waste Inspector  
Environmental Quality Section

cc: Mike Dawda  
Dave Nunallee  
James Sells

